

Plaintiffs' Exhibit 199

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

Alexandria Division

UNITED STATES, et al.,)	
)	
Plaintiffs,)	
v.)	No. 1:23-cv-00108-LMB-JFA
)	
GOOGLE LLC,)	
)	
Defendant.)	

DECLARATION OF KOBY L. SOUTH
IN SUPPORT OF PLAINTIFFS' OPPOSITION TO
GOOGLE'S MOTION FOR SUMMARY JUDGEMENT

Koby L. South, pursuant to 28 U.S.C. § 1746 hereby declares as follows:

1. I am over 21 years old and am competent to testify about the matters in this Declaration based on my personal knowledge.
2. I am a Management and Program Analyst, Office of Mental Health and Suicide Prevention, Veterans Health Administration, at the United States Department of Veteran Affairs (the V.A.), and submit this Declaration in support of Plaintiffs' Opposition to Google's Motion for Summary Judgment.
3. In coordination with J.R. Reingold & Associates, Inc. ("Reingold") and The District Communications Group ("DCG"), the V.A. develops and approves detailed media and advertising plans, which authorize Reingold and DCG to execute advertising purchases on the V.A.'s behalf, strictly in accordance with those media plans. Any deviations to the plans, purchases, or agreed upon strategies require written approval by V.A.

4. The discretion afforded to Reingold and DCG is limited to that authorized and approved by a V.A. media plan, and DCG and Reingold work closely with the V.A. to effectuate the V.A.'s goals and decisions.

5. The V.A. is contractually obligated to pay all invoices submitted by Reingold and DCG for the cost of approved ad purchases made on behalf of the V.A in accordance with detailed media and advertising plans.

6. Beyond purchasing advertising, Reingold and DCG also provide other communication services, which are itemized and identified separately from advertising purchases.

7. The exhibit beginning with Bates number **VET-AF-ADS-0000163359** is a true and correct copy of an excerpt from Task Order 36C10X21F0097 off Contract 47QRAA21D001F between V.A. and Reingold showing that media services are itemized and identified separately from media buys.

8. The exhibit beginning with Bates number **VET-AF-ADS-0000857553** is a true and correct copy of an excerpt from Contract 36C10X22C0004 between V.A. and DCG showing that media services are itemized and identified separately from media buys..

9. The exhibit beginning with Bates number **VET-AF-ADS-0000122733** is a true and correct copy of a 2021 media plan showing digital and display ad budgets and channel recommendations.

10. The exhibits discussed above were made and kept in the ordinary course of the V.A.'s business, and making and keeping these documents was a regular practice of the V.A.'s business.

I declare under penalty of perjury that the foregoing is true and correct. Executed on May
16, 2024.

Signed: 
KOBYL SOUTH

County and State: Bernalillo New Mexico